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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 3/14/18

U.S. District Court, S. D. of New York  
Thurgood Marshall U.S. Courthouse - Courtroom 706  
40 Foley Square  
New York, New York 10007

March 2, 2018

Re: Objection to Class Settlement in Morrow v. ANN Inc.  
Civil Action No. 1:16-cv-03340-JPO (S.D.N.Y.)

Dear Sir or Madam:

I am a class member in the above case because I received an email notice from the claims administrator on January 26, 2018 telling me so. I have never objected to a class settlement before. I asked my personal attorney, George W. Cochran, to advise me on what to do because he's experienced with class actions. Based on his advice, I make the following objections:

1. Following the 9<sup>th</sup> Circuit's recent decision on the Hyundai settlement, a national class can't be certified because the damage standards vary among the states' consumer protection statutes.
2. The \$1 million cash portion of the settlement is inadequate to provide a reasonable pro-rata apportionment among the class members.
3. The coupon portion is overvalued because experience shows the participation rate will be extremely low.
4. For that reason, the reasonableness of class counsel's attorney fee motion should not be decided until total claims participation is known.
5. Since I believe actual claims will be closer to \$2 million, the fee request greatly exceeds the 9<sup>th</sup> Circuit's 25% benchmark.
6. Finally, I don't believe class counsel's efforts justify paying 1.7 times their lodestar.

These objections apply to the whole class. Since I have not retained Mr. Cochran to represent me further in this matter, there is no need to list his representation in other class settlements. I will not be attending the fairness hearing. I hereby declare, under penalty of perjury, that I purchased merchandise offered at a discount from a regular or original price during the Class Period.

Respectfully Submitted,



Becky Morrow